

1 **JOSEPH W. CHARLES, P.C.**  
2 **5704 West Palmar Avenue**  
3 **P.O. Box 1737**  
4 **Glendale, Arizona 85311-1737**  
5 **Tel: (623) 939-6546**  
6 **Fax: (623) 939-6718**  
7 **Email: lawoffice@joecharles.com**

8 Joseph W. Charles  
9 State Bar #003038  
10 Attorneys for Debtor/Movant

11  
12 **IN THE UNITED STATES BANKRUPTCY COURT**  
13 **FOR THE DISTRICT OF ARIZONA**  
14

15 In re:

16 TODD SCOTT PIERSON,

17 Debtor.

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TODD SCOTT PIERSON,

19 Movant,

20 vs.

21 KEYBANK,

22 Respondent.

Chapter 13 Proceedings

Case No. 2:09-bk-22447-EWH

**NOTICE OF FILING MOTION TO  
AVOID LIEN**

RE: For the Third Deed of Trust on  
Real Property Located at  
10635 w. Lone Cactus Drive  
Peoria, Arizona 85382

23 **TO DEBTORS/MOVANT, DEBTOR/MOVANT'S COUNSEL**  
24 **AND THE TRUSTEE AND OTHER PARTIES-IN-INTEREST**

25 NOTICE IS HEREBY GIVEN pursuant to Local Rules of the United States  
26 Bankruptcy Court, Rule No. 4001-1(d), the Debtor/Movant has filed a Motion to Avoid  
27 Lien in the above-referenced Chapter 13 proceeding.  
28

1 Any objection or response to the Motion to Avoid Lien must be in writing and the  
2 original filed with the Clerk of the United States Bankruptcy Court, with a copy served  
3 upon Debtor/Movant's attorney, JOSEPH W. CHARLES, P.C., 5704 W. Palmaire  
4 Avenue, Glendale, Arizona, 85311.  
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6 NOTICE IS HEREBY FURTHER GIVEN that if no objection or response to the  
7 Motion to Avoid Lien is filed within twenty-three (23) days of the date of service of this  
8 Notice of Filing, Debtor/Movant's request that a dismissal may be granted without a  
9 hearing, upon the Debtor/Movant's filing a certificate of service and no objection.  
10

11 DATED this 11th day of June, 2010.  
12

13 **JOSEPH W. CHARLES, P.C.**  
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15  
16 By: /s/ Joseph W. Charles  
17 JOSEPH W. CHARLES  
18 5704 West Palmaire Avenue  
19 Post Office Box 1737  
20 Glendale, Arizona 85311  
21 Attorney for Debtor/Movant  
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2 The foregoing was electronically filed  
3 with the Clerk of the Court and a  
4 copy was mailed this 11th day of  
5 June, 2010, to:

6 All parties listed on the master mailing matrix attached; and

7 KeyBank  
8 c/o Weltman, Weinberg & Reis Co., LPA  
9 323 W. Lakeside Avenue, 2<sup>nd</sup> Floor  
10 Cleveland, OH 44113-1306

11 KeyBank  
12 c/o Henry I. Meyer III  
13 Chairman, President and CEO  
14 127 Public Square  
15 Cleveland, OH 44114-1306

16 KeyCorp  
17 c/o Henry L. Meyer III  
18 Chairman, President and CEO  
19 127 Public Square  
20 Cleveland, OH 44114-1306

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/s/ S. Watkins